

Message

From: Whitson, Amelia [Whitson.Amelia@epa.gov]
Sent: 1/31/2019 12:54:47 AM
To: btaylor@sandiego.gov
CC: R9.Info [R9.Info@epa.gov]; Lim, Joann@Waterboards [Joann.Lim@waterboards.ca.gov]
Subject: RE: more from Brian Taylor, San Diego

Hi Brian,

I was forwarded three pretreatment-related emails you'd submitted to EPA during our shutdown. As the EPA Region 9 Pretreatment Coordinator, I've provided an interim response to your question below, but you should direct all future pretreatment-related inquiries to the Pretreatment Coordinator at the San Diego Regional Water Quality Control Board (since they are your Pretreatment Approval Authority): Joann Lim, Joann.Lim@waterboards.ca.gov, (619) 521-3362.

In response to your inquiry below: if this industry does not generate any wastewater at all, are you asking if they meet the definition of an Industrial User? This would depend on your local pretreatment program, which should specify whether an industry like this needs to be regulated as a "zero-discharging industrial user" or would not meet the definition of an industrial user at all. Typically this determination depends on potential to discharge pollutants to your sewer system (i.e. does the facility have a sewer connection?), although how you regulate them can also depend on whether their operations fall under a specific industrial category (in the case below, it seems like they could fall under the metal finishing category at 40 CFR 433 because they are etching the Ni workpiece).

If you have any further questions, please feel free to follow-up with Joann (and I will be happy to support in any way I can).

Kind regards,

Amelia Whitson
Pretreatment Coordinator
NPDES Permits Office (WTR-2-3)
US EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3216

-----Original Message-----

From: drupal_admin@epa.gov [mailto:drupal_admin@epa.gov] On Behalf Of Brian Taylor via EPA
Sent: Wednesday, January 2, 2019 11:53 AM
To: R9.Info <R9.Info@epa.gov>
Subject: Inquiry from Region 9 Contact Us form

Question or comment submitted on 01/02/2019 2:53PM

Your Name: Brian Taylor
Organization: City of San Diego, Public Utilities Dept., Industrial Wastewater Control Program
Email: btaylor@sandiego.gov
Phone number: 858-654-4124
Your request or comment:

Hi,
My question is a machined Ni ring that is welded together with an identical Ni ring, is washed in a soap tank, dead rinse, a degreasing tank, dead rinse, and is then sent to a dye penetrant test. Following the dye pen test, the piece is masked at the weld sites and a swab of liquid etch is applied to the masked off section of the ring. After a period of time, a lint less paper towel is sprayed with DI water and the etchant is wiped off the ring.
This is done several times. The final step is an x-ray the part to check on the etched weld site before shipping or re-welding.
No regulated wastewater is accumulated for pretreatment or to be hauled offsite as liquid hazardous waste. Is this considered regulated since no wastewater is measurably generated; the paper wipe dries following the process. Thanks for your time.

Brian Taylor
Pretreatment Inspector II
Public Utilities Department
858-654-4124